



100-45
11/21/95
(signed)

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

SAUGET AREA 1 SITES

SUPERFUND COOPERATIVE AGREEMENT
QUARTERLY PROGRESS REPORT

Assistance ID Number: V005982-01

Site Name: Sauget Area 1 Sites

Activity: Enforcement Management Assistance

Reporting Period: FFY1995, Q4

I. WORK ACCOMPLISHED DURING REPORTING PERIOD

1. IEPA received a signed multisite Cooperative Agreement (CA) on October 6 that outlined the funding amounts for enforcement assistance in pre-NPL activities at Sauget Area 1 Sites. The submittal references IEPA's March 29, 1994 CA application. This application was a modification of the one that was earlier sent to USEPA and its content was essentially the same. It included a revised schedule that reflected delays associated with funding allocation problems and delays with the start of USEPA enforcement activities. IEPA has provided a very significant amount of enforcement assistance that predated the effective date of the CA. Details of this assistance are not provided here.

2. On October 21, IEPA assisted USEPA in reviewing remaining Monsanto files in St. Louis to obtain information responsive to USEPA's 104(e) request. Monsanto provided their opinions on Site Q and Site G removal activities and stated that they agreed in principle with USEPA's intentions towards Site G.

3. IEPA attended a meeting with Monsanto and USEPA on November 21 to discuss the Action Memorandum for both Site G and Site Q. The meeting focused on technical issues involving the USEPA proposal at Site G.

4. A formal request for State ARARs applicable to USEPA's Site G Action Memorandum was received on December 12. The request was forwarded to the IEPA ARAR coordinator.

5. IEPA attended a meeting at USEPA on December 19 to discuss several technical issues regarding USEPA's proposed removal action.

6. A Monsanto counterproposal on Site G activities was received on December 20 and a conference call was held the same day with USEPA Removal, IEPA and Monsanto sharing preliminary thoughts on Monsanto's submittal. IEPA raised concerns over HDPE liners on this call and faxed general State ARARs on USEPA's proposal. IEPA

later documented these ARARs and its basic understanding of how restrictive site-specific ARARs might be in a submittal to USEPA on December 27.

II.A CORRECTIVE MEASURES TAKEN

None.

II.B CORRECTIVE MEASURES PLANNED

Because of delays associated with sending out 104(e) and Special Notice letters, changes are expected to occur in the overall schedule leading to negotiations.

III. PROJECT SCHEDULE

Tasks	Original CA Appv'd Schd.	CA Appv'd Amended Schd.	Comp. Date
Review of Existing Information	10/94	N/A	10/94
Issuance/Review of 104(e) Letters	10/94	"	ongoing
Issuance of Special Notice Letters	1/95	"	3/95
Preparation for PRP Negotiations	10/94	"	ongoing
Negotiations with PRPs to Initiate RI/FS	3/95	"	5/95
Community Relations Support	10/94	"	ongoing

*** The "Review of Existing Information Task" was already completed and the "Issuance of Special Notice Letters Task" began before the modified CA application was sent. ***

PERCENTAGE OF ACTIVITY ACTUALLY COMPLETED: 9%

PERCENTAGE OF ACTIVITY SCHEDULED TO BE COMPLETED: 91%

EXPLANATION OF SIGNIFICANT SCHEDULING DIFFERENCES: See Section II.B

IV. PROJECT BUDGET

Tasks/Deliverables	CA Appv'd Budget Amt.	Est. Expendt. this Quarter	Est. Expendt. to Date
Enforcement Management Assistance	\$21,955	\$1,888	\$1,888

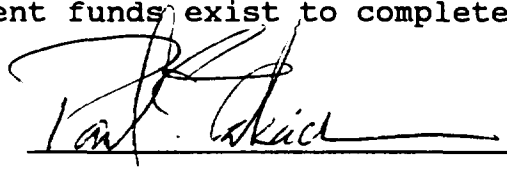
TOTAL CA: \$21,955

ACTUAL TIME AND FUNDS REMAINING: 9 months and \$20,067

EST. TIME/FUNDS NEEDED TO COMPLETE REQ'D WORK: 9 months and \$20,067

PLANNED FUNDING INCREASE REQUESTS: At the present time, it appears that sufficient funds exist to complete the project.

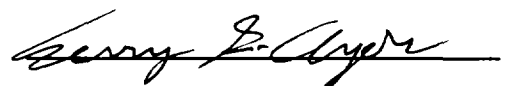
Prepared by:



Date:

13 Jan 95

Approved by:



Date:

1/27/95



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-3912

Refer to: L1630200005 -- St. Clair County
Sauget Sites (Area 1) -- Sauget
Superfund/Technical Reports

December 27, 1994

Mr. Samuel F. Borries
On-Scene Coordinator
USEPA-Region V, HSE-5J
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Dear Sam:

This is in reference to your December 8 written request to IEPA for ARARs governing the upcoming proposed removal action at Site G. I've identified the general ARARs noted in the attachment as being applicable both to USEPA's and Monsanto's proposals for Site G. These ARARs are the same ones that I faxed to you before our conference call with Monsanto on December 20 and although they are general in nature, I hope to have site-specific ARARs available for you by mid to late January.

Preliminary conversations with my reviewers have indicated that if this removal action is going to be considered an "interim" action (which I believe to be the case), site-specific ARARs may not be as stringent as USEPA and Monsanto have been led to believe. I will hopefully have more to say on this shortly.

If you have questions or concerns relating to this letter, please give me a call.

Sincerely,

Paul E. Takács, Project Manager
National Priorities List Unit
Division of Remediation Management
Bureau of Land

Attachment - General ARARs

cc: Terry Ayers (w/o attachment)
Kim Hubbert (w/o attachment)
Jeff Gore, USEPA
Division File

APPENDIX A

APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS a/

1. Office of Solid Waste

- Resource Conservation and Recovery Act of 1976 (42 U.S.C. 6901) b/
 - a. 40 CFR Part 264, applicable for permitted facilities c/, and 40 CFR Part 265, for interim status facilities.
 - Groundwater Protection (40 CFR 264.90-264.101)
 - Groundwater Monitoring, Subpart F (40 CFR 264.98-264.100) d/
 - Closure and Post-Closure (40 CFR 264.110-264.120, 265.110-265.120)
 - Containers (40 CFR 264.170-264.178, 265.190-265.177)
 - Tanks (40 CFR 264.190-264.200, 265.190-265.199)
 - Surface Impoundments (40 CFR 264.220-264.249, 265.220-265.230)
 - Waste Piles (40 CFR 264.250-264.269, 265.250-265.258)
 - Land Treatment (40 CFR 264.270-264.299, 265.270-265.282)
 - Incinerators (40 CFR 264.340-264.399, 265.340-265.369)
 - Land Disposal Restrictions (40 CFR 268.1-268.50)
 - b. 40 CFR Part 280, Underground Storage Tank Regulations
 - c. Statutory requirements, including:
 - Liquids in Landfills (RCRA §3004(c))
 - Minimum Technology Requirements (RCRA §3004(o), 3005(j))
 - Dust Suppression (RCRA §3004(e))
 - Hazardous Waste Used as Fuel (RCRA §3004(q))
 - d. Open Dump Criteria - pursuant to RCRA Subtitle D; criteria for classification of solid waste disposal facilities (40 CFR Part 257). Note: For nonhazardous wastes.

2. Office of Water

- The Safe Drinking Water Act (42 U.S.C. 300(f))
 - a. Maximum Contaminant Levels (chemicals, turbidity, and microbiological contamination) (for drinking water or human consumption) (40 CFR 141.11-141.16).
 - b. Maximum Contaminant Level Goals (40 CFR 141.50-141.51, 50 FR 46936).

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- Clean Water Act (33 U.S.C. 1251)
Requirements established pursuant to sections 301 (effluent limitations), 302 (effluent limitations), 303 (water quality standards, including State water quality standards), 304 (Federal water quality criteria), 306 (national performance standards), 307 (toxic and pretreatment standards, including Federal pretreatment standards for discharge into publicly owned treatment works, and numeric standards for toxics), 402 (national pollutant discharge elimination system), 403 (ocean discharge criteria), and 404 (dredged or fill material) of the Clean Water Act, (33 CFR Parts 320-330, 40 CFR Parts 122, 123, 125, 131, 230, 231, 233, 400-469). Available ambient Water Quality Criteria Documents are listed at 45 FR 79318, November 28, 1980; 49 FR 5831, February 15, 1984; 50 FR 30784, July 29, 1985; 51 FR 22978, June 28, 1986; 51 FR 43665, December 3, 1986; 51 FR 8012, March 7, 1986; 52 FR 6213, March 2, 1987.
 - EPA's Statement of Procedures on Floodplains Management and Wetlands Protection, (40 CFR Part 6 Appendix A) g/
3. Office of Air and Radiation
- Clean Air Act (42 U.S.C. 7401)
 - a. National Emissions Standards for Hazardous Air Pollutants for Asbestos and Wet Dust particulates, (40 CFR 61.140-61.156), and for other hazardous substances (40 CFR Part 61 generally). See also effluent limitations and pretreatment standards for Wet Dust Collection (40 CFR 427.110-427.116) and 40 CFR Part 763.
 - b. Standards of performance for new stationary sources, including new incinerators (42 U.S.C. 7411), (40 CFR Part 60).
4. Other Federal Requirements
- OSHA requirements for workers engaged in response or other hazardous waste operations (29 CFR 1910.120).
 - Occupational Safety and Health Act of 1970 (29 U.S.C. 651).
 - a. Occupational Safety and Health Standards (General Industry Standards) (29 CFR Part 1910).
 - b. The Safety and Health Standards for Federal Service Contracts (29 CFR Part 1926).
 - c. The Health and Safety Standards for Employees engaged in Hazardous Waste Operations. (50 FR 45654).
 - Department of Transportation Rules for the Transportation of Hazardous Materials, 49 CFR Parts 107, 171.1-172.558.
 - Endangered Species Act of 1973, 16 U.S.C. 1531. (Generally, 50 CFR Parts 81, 225, 402).
 - Wild and Scenic Rivers Act, 16 U.S.C. 1271.
 - Fish and Wildlife Coordination Act, 16 U.S.C. 661 note.
 - Fish and Wildlife Improvement Act of 1978, and Fish and Wildlife Act of 1956, 16 U.S.C. 742a note.
 - Fish and Wildlife Conservation Act of 1980, 16 U.S.C. 2901. (Generally, 50 CFR Part 83).

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4. Other Federal Requirements (Cont.)

- Farmland Protection Policy Act, 7 U.S.C. 4201. (Generally, 7 CFR Part 658).
- Rivers and Harbors Act (33 U.S.C. 403).

5. State Requirements

- Title 35: Env. Prot. Act Subtitle B:
 - a. Air Pollution Chapter T: Subchapter C:
 - 35 IAC 212.121-125,
 - 35 IAC 212.421
 - b. Air Pollution Subchapter A:
 - 35 IAC 201.151
 - c. Air Pollution Subparagraph A: Permits
 - 35 IAC 201.141-144,
 - 35 IAC 201.146-147,
 - 35 IAC 201.149,
 - 35 IAC 201.12-165,
 - 35 IAC 201.207-210,
 - 35 IAC 201.261-265,
 - 35 IAC 201.282-283,
 - 35 IAC 201.301-302
 - d. Air Pollution Subchapter C, Emissions Stds. and Limitations for Stationary Sources
 - 35 IAC 212.110,
 - 35 IAC 212.181-185
 - 35 IAC 212.302,
 - 35 IAC 212.304-310,
 - 35 IAC 212.312-315,
 - 35 IAC 212.321-323,
 - 35 IAC 212.361,
 - 35 IAC 212.381,
 - 35 IAC 212.422,
 - 35 IAC 212.441,
 - 35 IAC 212.455-457,
 - 35 IAC 212.461-463,
 - 35 IAC 212.681,
 - 35 IAC 215.101-102,

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- Title 35: Env. Prot. Act Subtitle B: (Cont)
 - d. Air Pollution Subchapter C, Emissions Sids. and Limitations for Stationary Sources (Cont.
 - 35 IAC 215.121-122,
 - 35 IAC 215.141.144,
 - 35 IAC 215.301-304,
 - 35 IAC 215.500,
 - 35 IAC 215.541,
 - 35 IAC 215.562,
 - 35 IAC 231.110,
 - 35 IAC 231.122,
 - 35 IAC 231.130,
 - 35 IAC 231.140,
 - 35 IAC 231.150,
 - 35 IAC 231.160,
 - 35 IAC 231.180,
 - 35 IAC 231.190,
 - 35 IAC 231.200,
 - 35 IAC 231.210,
 - 35 IAC 231.230,
 - 35 IAC 231.240,
 - 35 IAC 231.250,
 - 35 IAC 231.260,
 - 35 IAC 231.320,
 - 35 IAC 309.1.1-191
 - e. Air Pollution Subchapter K:
 - 35 IAC 240.103-104,
 - 35 IAC 240.121
 - 35 IAC 243.104-108,
 - 35 IAC 243.121-126
- Title 35: Env. Prot. Subtitle C:
 - a. Water Pollution Subpart B: General Use Water Quality Standards
 - 35 IAC 302.208
 - 35 IAC 302.210
 - 35 IAC 304.120-126,
 - 35 IAC 304.201-206,

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- Title 35: Env. Prot. Subtitle C: (Cont.)
 - a. Water Pollution Subpart B: General Use Water Quality Standards (Cont.)
 - 35 IAC 304.301,
 - 35 IAC 306.201,
 - 35 IAC 306.302-306,
 - 35 IAC 306.401-406,
 - 35 IAC 309.201-282
 - b. Water Pollution Subpart C: Public and Food Processing Water Supply Standards
 - 35 IAC 302.304
 - 35 IAC 304.102-106,
 - 35 IAC 304.141,
 - 35 IAC 305.102-103,
 - 35 IAC 305.306,
 - 35 IAC 305.102,
 - 35 IAC 307.101-105
- Title 35: Env. Prot. Subtitle F:
 - a. Public Water Supplies Subpart B:
 - Chemical and Physical Quality 35 IAC 604.202
 - Public Water Supplies 35 IAC 604.203-204, 605.103
- Title 35 Env. Prot. Act Subtitle G:
 - a. Waste Disposal C:
 - 35 IAC 700.101-504,
 - 35 IAC 702.101-187,
 - 35 IAC 703.101-246,
 - 35 IAC 704.101-203,
 - 35 IAC 705.121-212,
 - 35 IAC 720.101-122,
 - 35 IAC 721.101-133,
 - 35 IAC 722.110-131,
 - 35 IAC 724.101-451,
 - 35 IAC 725.101-530,
 - 35 IAC 726.120-180,
 - 35 IAC 730.101-152 Dept. of Mines and Minerals Rule IIA,
 - 35 IAC 809.101-802,
 - 35 IAC 811

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- Title 35 Env. Prot. Act Subtitle G: (Cont.)
 - b. Sanitary Landfills Subpart E: Closure and Postclosure
 - 35 IAC 807.301-315,
 - 35 IAC 807.318,
 - 35 IAC 807.501-524,
 - 35 IAC 807.600-666
- Title 35 Env. Prot. Act Subtitle H:
 - a. Noise
 - 35 IAC 902.101,
 - 35 IAC 902.102,
 - 35 IAC 902.120-125,
 - 35 IAC 902.140-141
- Title 92 IL Adm. Code, Transportation Subchapter C:
 - a. Haz. Mat.
 - 92 IAC 171.1-317,
 - 92 IAC 172.1000-2215,
 - 92 IAC 173.2000-3000
- Illinois Water Well Construction Code Law
(Ill. Rev. Stat. 1987 Ch. 111 1/2, pars. 116, 111-118, as amended)
- Illinois Water Well and Pump Installation Contractors Licensing Act
(Ill. Rev. Stat. 1987 Ch. 111, pars. 7101-7130, as amended).
- PA 85-1195 Part I:
Hazardous Waste Crane and Hoisting Equipment Operators Licensing Act (S.H.A. Ch. 11, par. 7701 et seq., as amended)
- I.D.O.T.
Dir. of Highways
Sec. 15 Ill. Vehicle Code Based on Federal Bridge Formulas
- State Field Sampling Procedures

APPENDIX A

APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS ^{a/}

OTHER FEDERAL AND STATE CRITERIA, ADVISORIES, AND GUIDANCE TO BE CONSIDERED ^{a/}

1. Federal Criteria, Advisories, and Procedures

- Health Effects Assessments (HEAs) and Proposed HEAs, ("Health Effects Assessment for (Specific Chemicals), "ECAO, USEPA, 1985).
- Reference Doses (RfDs), ("Verified Reference Doses of USEPA," ECAO-CIN 475, January 1986). See also Drinking Water Equivalent Levels (DWELs), a set of medium-specific drinking water levels derived from RfDs. (See USEPA Health Advisories, Office of Drinking Water, March 31, 1987).
- Carcinogen Potency Factors (CPFes) (e.g., Q1 Stars, Carcinogen Assessment Group [CAG] Values), (Table 11, "Health Assessment Document for Tetrachloroethylene (Perchloroethylene)," USEPA, OHEA/6008 82/005F, July 1985).
- Waste load allocation procedures, EPA Office of Water (40 CFR Part 125, 130).
- Federal Sole Source Aquifer requirements (see 52 FR 6873, March 5, 1987).
- Public health criteria on which the decision to list pollutants as hazardous under Section 112 of the Clean Air Act was based.
- Guidelines for Groundwater Classification under the EPA Groundwater Protection Strategy.
- Advisories issued by PWS and NWPS under the Fish and Wildlife Coordination Act.
- OSHA health and safety standards that may be used to protect public health (non-workplace).
- Health Advisories, EPA Office of Water.
- EPA Water Quality Advisories, EPA Office of Water, Criteria and Standards Division.

2. USEPA RCRA Guidance Documents

- Interim Final Alternate Concentration Limit Guidance Part I: ACL Policy and Information Requirements (July, 1987)
 - a. EPA's RCRA Design Guidelines
 - b. Permitting Guidance Manuals
 - c. Technical Resource Documents (TRDs)
 - d. Test Methods for Evaluating Solid Waste

3. USEPA Office of Water Guidance Documents

- a. Pretreatment Guidance Documents
- b. Water Quality Guidance Documents
- c. NPDES Guidance Documents
- d. Groundwater/UIC Guidance Documents
- e. Groundwater Protection Strategy (August 1984).
- f. Clean Water Act Guidance Documents

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OTHER FEDERAL AND STATE CRITERIA, ADVISORIES, AND GUIDANCE TO BE CONSIDERED a/

- 4 EPA Manuals from the Office of Research and Development
 - SW 846 methods - laboratory analytic methods (November 1986)
 - Lab protocols developed pursuant to Clean Water Act Section 304(h).
- 5 Nonpromulgated State Advisories
 - State approval of water supply system additions or developments.
 - State groundwater withdrawal approvals.
 - Superfund program groundwater cleanup goals.
 - Recommended allowable drinking water limits.
 - 10^{-5} risk level

Source: EPA CERCLA COMPLIANCE WITH OTHER LAWS MANUAL; May 6, 1988 (OSWER Directive 9234.1-01).

- a/ This is the list of potentially applicable or relevant and appropriate requirements found in the October 2, 1985, Compliance Policy with additions. As additional requirements are promulgated, they will be considered potentially applicable or relevant and appropriate and added to this list.
- b/ In authorized States, Federal regulations promulgated under RCRA are not applicable as a State requirement until the State adopts those regulations through its own legislative process, but probably would be relevant and appropriate as a federal requirement. Federal regulations promulgated pursuant to the Hazardous and Solid Waste Amendments of 1984, however, are effective immediately in all 50 states, and are potentially applicable as Federal requirements.
- c/ 40 CFR Part 264 regulations apply to permitted facilities and may be relevant and appropriate to other facilities.
- d/ Only Subpart F groundwater monitoring requirements under 40 CFR 264 are ARAR. The Subpart F groundwater monitoring requirements under 40 CFR 265 are not ARAR.
- e/ 40 CFR Part 6 Subpart A sets forth EPA policy for carrying out the provisions of Executive Orders 11988 (Floodplains Management) and 11990 (Protection of Wetlands).

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